## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Bankruptcy No. 15-16119-sr

MARY E. JONES, Chapter 13

Debtor, Document No. 59

NATIONSTAR MORTGAGE LLC D/B/A CHAMPION MORTGAGE COMPANY,

Movant,

V.

MARY E. JONES and FREDERICK L. REIGLE, Ch. 13 Trustee

Respondents

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Secured Creditor, NATIONSTAR MORTGAGE LLC D/B/A CHAMPION MORTGAGE COMPANY has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1) to permit NATIONSTAR MORTGAGE LLC D/B/A CHAMPION MORTGAGE COMPANY to foreclose on 228 South 49<sup>th</sup> Street, Philadelphia, Pennsylvania 1913919139.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **Monday, November 14, 2016**, you or your attorney must do **all** of the following:
  - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107 If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorneys:

Peter J. Ashcroft, Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200, Gulf Tower Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Stephen Raslavich on **Wednesday, November 30, 2016 at 10:00 A.M.** in Courtroom #4, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Peter J. Ashcroft
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Counsel for Nationstar Mortgage LLC

Dated: October 28, 2016